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 Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:	CASE NO. BK-21-14978-ABL
SILVER STATE BROADCASTING, LLC,	Chapter 11
AFFECTS THIS DEBTOR <input type="checkbox"/>	<i>Jointly Administered with:</i>
AFFECTS GOLDEN STATE BROADCASTING, LLC <input type="checkbox"/>	Golden State Broadcasting, LLC Case No. 21-14979-ABL
AFFECTS MAJOR MARKET RADIO, LLC <input type="checkbox"/>	Major Market Radio, LLC Case No. 21-14980-ABL
AFFECTS ALL DEBTORS <input checked="" type="checkbox"/>	<u>Hearing Date:</u> Date: May 1, 2023 Time: 1:30 p.m. Pacific Time

**STIPULATION BETWEEN CHAPTER 11 TRUSTEE AND C&E HAAS
 DEVELOPMENT COMPANY, LLC TO EXTEND BRIEFING DEADLINES AND
 CONTINUE HEARING REGARDING TRUSTEE’S EMERGENCY MOTION FOR
 MODIFICATION OF THE AUTOMATIC STAY OR, IN THE ALTERNATIVE, RELIEF
 FROM CURRENT STAY MODIFICATION ORDER AND TO REINSTATE THE
AUTOMATIC STAY [ECF NO. 446]**

Michael Carmel, in his capacity as the Chapter 11 trustee (“Trustee”) of the bankruptcy estates of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market Radio, LLC,¹ by and through his counsel of record Gregory E. Garman, Esq., Talitha Gray

¹ (Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market Radio, LLC collectively, the “Debtors”).

1 Kozlowski, Esq., and Mary Langsner, Ph.D. of the law firm Garman Turner Gordon LLP, and
 2 C & E Haas Development Company, LLC (“C&E”), by and through its counsel of record Candace
 3 C. Carlyon, Esq. and Tracy M. O’Steen, Esq. of the law firm Carlyon Cica Chtd., stipulate and
 4 agree as follows:

5 RECITALS

6 1. On October 19, 2021 (“Petition Date”), the Debtors filed their voluntary petitions
 7 for relief under Chapter² 11 of the Bankruptcy Code, thereby commencing the above-captioned
 8 bankruptcy cases (the “Chapter 11 Cases”). See ECF No. 1.

9 2. On November 19, 2021, this Court entered its *Order Authorizing Joint*
 10 *Administration of Cases* directing that “the Chapter 11 case of SILVER STATE
 11 BROADCASTING, LLC (Case No. 21-14978-abl), shall be jointly administered with the Chapter
 12 11 cases of GOLDEN STATE BROADCASTING, LLC (Case No. 21-14979-abl) and MAJOR
 13 MARKET RADIO LLC (Case No. 21-14980-abl), with SILVER STATE BROADCASTING,
 14 LLC designated as the Lead Case (“Lead Case”), and all papers relating to the above referenced
 15 Debtors shall be docketed in the Lead Case (Case No. 21-14978-abl).” See ECF No. 37.

16 3. On March 6, 2023, this Court entered its *Order on United States Trustee’s Motion*
 17 *to Appoint Chapter 11 Trustee Under 11 U.S.C. § 1112(b); and Memorandum of Point and*
 18 *Authorities in Support and Reservation of Rights [ECF No. 405], and Creditor Mincin Law,*
 19 *PLLC’s Motion for Appointment of Chapter 11 Trustee [ECF No. 393],* thereby directing the
 20 appointment of a Chapter 11 trustee for the Debtors’ estates. See ECF No. 419.

21 4. On March 10, 2023, Tracy Hope Davis, the United States Trustee for Region 17,
 22 appointed the Trustee as the Chapter 11 trustee for Debtors’ estates. See ECF No. 420.

23 5. On March 10, 2023, the Court entered its *Order Approving Appointment of Chapter*
 24 *11 Trustee* [ECF No. 422], thereby approving the Trustee’s appointment.

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 27 ² All references to “Section” herein shall be to the Bankruptcy Code appearing in Title 11 of the U.S. Code; all
 28 references to a “Bankruptcy Rule” shall refer to the Federal Rules of Bankruptcy Procedure; and all references to a
 “Local Rule” shall refer to the Local Rules of Bankruptcy Practice of the U.S. District Court for the District of Nevada.

6. On March 13, 2023, the Trustee filed his *Notice of Acceptance of Appointment of Chapter 11 Trustee* accepting appointment as the Chapter 11 trustee for the Debtors' estates. See ECF No. 424.

7. On March 31, 2023, the Trustee filed his *Emergency Motion for Modification of the Automatic Stay or, in the Alternative, Relief from Current Stay Modification Order and to Reinstate the Automatic Stay* [ECF No. 446] (the "Motion").

8. The Motion was noticed for a hearing date of May 1, 2023, at 1:30 p.m. prevailing Pacific Time ("Hearing"), with a commensurate opposition deadline set by Local Rule of Bankruptcy Practice of the United States Bankruptcy Court for the District of Nevada of April 17, 2023, with any reply by the Trustee due on April 24, 2023 (together, the "Original Briefing Deadlines"). See ECF No. 449.

9. By stipulation of the Trustee and C&E (together, the "Parties"), the Original Briefing Deadlines were extended as follows: C&E's opposition deadline continued to the new date of April 21, 2023 ("C&E Opp. Deadline"), and the Trustee's reply deadline continued to the new date of April 28, 2023 ("Trustee Reply Deadline"; together with the C&E Opp. Deadline, the "Current Briefing Deadlines"). See ECF No. 480 ("Stipulation"). The Stipulation was approved by the Court. See ECF No. 493.

10. The Parties continue to dialogue respecting the Motion and seek additional time to continue their discussions; therefore the Parties respectfully request a continuance of the Current Briefing Deadlines and the Hearing as set forth herein:

- That the Hearing be continued for thirty (30) days, or to a date set by the Court in any order approving of this Stipulation ("Continued Hearing Date");
- That the C&E Opp. Deadline be continued from April 21, 2023, to a date fourteen (14) days before the Continued Hearing Date; and
- That the Trustee's Reply Deadline be continued from April 28, 2023, to a date seven (7) days before the Continued Hearing Date.

STIPULATION

Based on the foregoing, the Trustee and C&E stipulate and agree to continue the Hearing

1 from May 1, 2023, at 1:30 p.m. for thirty (30) days, or to a date set by the Court in any order
2 approving of this Stipulation; and to continue the deadline for C&E to file any response in
3 opposition to the Motion [ECF 446], from April 21, 2023, to a date fourteen (14) days before the
4 Continued Hearing Date set by this Court; and to continue the deadline for the Trustee to reply in
5 response to any C&E opposition from April 28, 2023, to a date seven (7) days before the Continued
6 Hearing Date set by this Court.

7 A proposed Order approving this Stipulation has been lodged contemporaneously
8 herewith.

9 Dated this 21st day of April, 2023.

Dated this 21st day of April, 2023

10 GARMAN TURNER GORDON LLP

CARLYON CICA CHTD.

11 By: /s/ Mary Langsner
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